

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR TBW MORTGAGE-BACKED
TRUST SERIES 2006-2, TBW MORTGAGE-
BACKED PASS-THROUGH CERTIFICATES,
SERIES 2006-2,

Plaintiff,

v.

JOSEPH MOREL, PAMELA SOARES f/k/a
PAMELA MOREL and MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS
INC., AS NOMINEE FOR AMERICAN
BROKERS CONDUIT,

Defendants.

C.A. NO. 1:19-cv-00490-MSM-LDA

MOTION TO DISMISS DEFENDANT JOSEPH MOREL'S COUNTERCLAIM

Pursuant to Federal Rule of Civil Procedure 37(b)(2)(A) and LR, D.R.I. 7, the Plaintiff/Counterclaim Defendant, U.S. Bank, National Association, as Trustee for TBW Mortgage-Backed Trust Series 2006-2, TBW Mortgage-Backed Pass-Through Certificates, Series 2006-2 ("U.S. Bank, N.A., as Trustee"), moves for dismissal of Defendant/Counterclaim Plaintiff, Joseph Morel's ("Morel") Counterclaim based on his failure to comply with this Court's discovery orders.

In support of this Motion, U.S. Bank, N.A. as Trustee submits herewith a memorandum of law in support of its Motion to Dismiss.

Respectfully submitted,

U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR TBW MORTGAGE-
BACKED TRUST SERIES 2006-2, TBW
MORTGAGE-BACKED PASS-THROUGH
CERTIFICATES, SERIES 2006-2

By: Its Attorneys

/s/ Jamal D. Burk

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401-751-0842

401-751-0072 (facsimile)

Dated: April 23, 2021

CERTIFICATE OF SERVICE

I, Jamal D. Burk, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 23, 2021.

/s/ Jamal D. Burk

Jamal D. Burk, Bar #9550